

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SECURITIES AND EXCHANGE COMMISSION

Plaintiff,

Case No. 1:18-cv-08175-ER

v.

BARRY C. HONIG,
et al.

Defendants.
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**DECLARATION OF ADAM C. FORD IN SUPPORT OF
DEFENDANT ROBERT LADD'S MEMORANDUM OF LAW IN OPPOSITION TO
PLAINTIFF'S MOTION FOR RELIEF**

I, Adam C. Ford of Ford O'Brien Landy LLP, pursuant to 28 U.S.C § 1746, declare as follows:

1. I am an attorney duly licensed to practice law in the State of New York. I am a partner with the law firm Ford O'Brien Landy LLP, counsel for Defendant Robert Ladd in the above-captioned matter.
2. I respectfully submit this declaration in support of Defendant Robert Ladd's Memorandum of Law in Opposition to Plaintiff's Motion For Relief. I have personal knowledge of the facts below and, if called as a witness, I could and would testify competently thereto.
3. Attached hereto as Exhibit 1 is a true and correct copy of a chart with publicly available stock information from Yahoo Finance illustrating MGT stock data from early 2016 to late 2018. This chart has a circle to reflect the time period when Ladd sold the overwhelming majority of shares at issue in this case.

4. Attached hereto as Exhibit 2 is a true and correct copy of the SEC's Response to Ladd's Interrogatory, with a focus on the SEC's response No. 17.
5. Attached hereto as Exhibit 3 is a true and correct copy of a chart illustrating Robert Ladd's out-of-pocket costs in acquiring shares of MGT, along with back up showing the purchases. The sales of shares are all based on the SEC's exhibits and corresponding information associated with them.
6. Attached hereto as Exhibit 4 is a true and correct copy of the Inflation Adjustments to the Civil Monetary Penalties Administered by the Securities and Exchange Commission, which is current as of January 15, 2024.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 12, 2024
New York, NY

/s/ Adam C. Ford
Adam C. Ford